

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Provision of Improved Telecommunications)	CC Docket No. 98-67
Relay Services and Speech-to-Speech)	
Services for Individuals with Hearing and)	
Speech Disabilities)	
)	
Clarification of Procedures for)	
Emergency Calls at Telecommunications)	
Relay Centers (TRS))	

COMMENTS OF VERIZON¹

The Commission should revise the language of section 64.604(a)(4) of its rules to clarify that emergency Telecommunications Relay Service (TRS) calls should be sent to “an appropriate” Public Safety Answering Point (PSAP), rather than “the nearest” PSAP, as is suggested in the current rule language. *See* Public Notice, DA 02-1826, at 1 & n.1 (rel. July 29, 2002).² This language change would be consistent with the original PSAP order, which stated that the Commission would require calls to be directed “as quickly as possible to the *correct* Public Safety Answering Point, or PSAP,” and referred to a solution “that quickly connects callers to “the *appropriate* PSAP” – which, as discussed below, is not necessarily the “nearest” one. *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals*

¹ The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc., and are listed in Attachment A.

² The rule currently states, in relevant part, as follows:

Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to the nearest Public Safety Answering Point (PSAP).

with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 5140, ¶ 100 (2000) (emphasis added).

Changing the language from “the nearest” to “an appropriate” PSAP is necessary because the wording of the present rule is unworkable and is inconsistent with the manner in which TRS emergency service is currently provided. That is because “the nearest” PSAP to the caller, as specified in the rule, is not always an “appropriate” or “correct” one to serve the customer.³

While in many cases an “appropriate” PSAP also may be the “nearest” one, that will not always be the case. Indeed, sending the call to the PSAP center “nearest” the caller in some cases may *delay* emergency assistance. For example, Verizon is aware of more than one geographic area where the PSAP that is “closest” the caller does not have the authority or ability to serve the caller. In such a case, when the nearest PSAP may not be equipped to serve the caller, relaying the call there would be inappropriate. The systems that are deployed in the TRS centers should ensure that the call is immediately relayed to a center that is equipped and jurisdictionally able to serve the caller, regardless of its proximity to either the center or the caller’s location.

Because there may be more than one PSAP that is equipped and able to handle the emergency call, the language of rule 64.604(a)(4) also should be changed to clarify that the TRS provider satisfies its obligation by transferring the call to “*an* appropriate” PSAP, rather than “*the* appropriate” one. Again, without this change, if the rule were read narrowly so that the TRS

³ Moreover, there is some ambiguity in the way the current rule is drafted. Although it refers to the “nearest” PSAP, the rule does not state whether the PSAP must be the one “nearest” to the caller or “nearest” the TRS center. The better interpretation of the rule would be that the PSAP “nearest” the caller be contacted, because TRS centers are often centralized within a state or region of a state, and the center serving the customer may not be close to the location from which the call is placed.

provider believed that it had to ascertain which of a number of “appropriate” PSAP providers was the *most* “appropriate” one, that would needlessly delay the speedy provision of emergency services to the caller.

Ideally, TRS users who need emergency services should not access 911 through the relay center but should instead directly call the 911 PSAP, all of which are required to be equipped to receive and process TTY calls under the Americans with Disabilities Act. Of course, some users may still access the relay center for emergency calls, and, especially if the Commission modifies its rule as proposed in the public notice, such calls will be handled as efficiently and quickly as possible. However, there will always be inherent delays when two centers (the Relay Center and the PSAP) must sequentially process the call. Therefore, Verizon’s directories inform TRS customers to dial 911 directly in the case of an emergency.

Conclusion

The Commission should change rule 64.604(a)(4)’s reference from “the nearest” to “an appropriate” PSAP, which will be more in keeping with the goals of efficient TRS service for 911 calls.

Respectfully submitted,



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August 29, 2002

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.